

REMARKS

Claims 1-23 are pending in the application.

Claims 1-23 have been rejected.

Claims 1-8, 11-18, 20 and 22-23 have been amended. Support for these claim amendments can be found at least in paragraphs [0028]–[0045] and [0069].

Informalities

Claims 18-21 stand objected to due to a typographical error in Claims 18 and 20. *See* Office Action, p. 5. Applicants respectfully submit that Claims 18 and 20 have been amended accordingly to correct the typographical error.

Specification

The specification is objected to as failing to provide proper antecedent basis for the claimed subject matter. *See* Office Action, p. 5. Applicants respectfully submit that the specification does in fact provide proper antecedent basis for the claimed subject matter.

The Examiner has requested correction of the claim terms “means for defining an opportunity class,” “means for receiving opportunity data,” and “means for transforming the opportunity data” as they appear to lack support in the specification. *Id.* Applicants respectfully submit that no correction is needed for the above mentioned claim elements, as the elements are supported by the specification, at least at paragraphs [0029]–[0045].

Furthermore, the Examiner has requested clarification as to which structure, materials, or acts perform the means for defining an opportunity class, means for receiving opportunity data, and means for transforming the opportunity data. *Id.*, p. 6. In

response to this request, Applicants respectfully re-iterate the above statements that the Application provides sufficient support for the claims at least in paragraphs [0029]-[0045] and [0069]. However, in an attempt to clarify this point, Applicants have amended Claims 22 and 23 to recite an integration server with means for defining, receiving, and transforming. Support for this amendment (and the means noted above) can be found at least in paragraphs [0029]-[0045] and Figures 1, 2, and 5-14. Thus, Applicants respectfully submit that the Examiner's concerns have been addressed and accordingly request that the objection to the specification be withdrawn.

Rejection of Claims under 35 U.S.C. §101

Claims 1-17 stand rejected under 35 U.S.C. §101 because the claimed invention is purportedly directed to non-statutory subject matter. *See* Office Action, p. 2. Applicants respectfully traverse this rejection.

Claims 1 and 8 have been amended to recite method operations that are "performed at an integration server." Applicants respectfully submit that Claims 1 and 8 are now tied to another statutory class, particularly an apparatus, in the form of an integration server. Thus, Applicants respectfully submit that the Examiner's concerns have been addressed and accordingly submit that the rejections to Claims 1 and 8 are overcome thereby. Claims 2-7 and 9-10 are dependent upon allowable base Claims 1 and 8, and for at least these reasons, Applicants respectfully submit that the rejection to these claims should be reconsidered and withdrawn.

Furthermore, the Office Action asserts that Claims 11-17 recite a machine-readable medium and thus are directed to non-statutory subject matter. *Id.*, pp. 4-5.

Applicants respectfully submit that Claims 11-17 have been amended to address the Examiner's concerns. Thus, Applicants respectfully submit that the Examiner's concerns have been addressed and accordingly submit that this rejection is overcome thereby.

Rejection of Claims under 35 U.S.C. § 112

Claim 6 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. *See* Office Action, p. 7. Applicants respectfully traverse this rejection.

The Examiner has asserted that there is insufficient antecedent basis for the limitation "the data" in Claim 6 as it is unclear whether the data is the same as the transforming data or the data element of earlier claims. *Id.* Applicants respectfully submit that Claim 6 has been amended to clarify the limitation "the data" in lines 4 and 6. The limitation in line 4 now recites "the data transformed into the common format," which refers to the data transformed in line 2 of Claim 6. Similarly, the limitation in line 6 now recites "the data transformed into the target format," which refers to the data transformed in line 4 of Claim 6. Thus, Applicants respectfully submit that the Examiner's concerns have been addressed and accordingly submit that this rejection is overcome thereby.

Claims 22 and 23 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. *Id.* Applicants respectfully traverse this rejection.

The Examiner has asserted that the “means for” language in Claims 22 and 23 renders the scope of the claims unclear. Applicants respectfully submit that Claims 22 and 23 have been amended to address the Examiner’s concerns. Claim 22 recites an integration server comprising means for defining an opportunity class. Similarly, Claim 23 recites an integration server comprising means for receiving opportunity data and means for transforming the opportunity data. Hence, Applicants respectfully submit that Claims 22 and 23 particularly point out and distinctly claim the subject matter which the Applicants regard as their invention.

Rejection of Claims under 35 U.S.C. § 102(b)

Claims 1-6, 8-13 and 15-23 stand rejected under 35 U.S.C. § 102(e) as anticipated by being unpatentable over International Publication No. W0 01/43031 listing Chin as the inventor (“Chin”). See Office Action, p. 8. Applicants respectfully traverse this rejection.

Amended independent Claim 1 is representative of independent Claims 11, 18, and 22, and now recites:

1. A computer implemented method comprising:
defining an opportunity class representing an opportunity, the opportunity class identifying a set of relationships of the opportunity with a plurality of entities related to the opportunity, wherein
the defining is performed at an integration server; and
transforming data received from a source application, wherein
the transforming is performed at the integration server.

The Office Action relies on Chin to disclose the limitations of Claim 1. *See* Office Action, p. 8. However, Applicants respectfully submit that Chin fails to show, teach, or even suggest, among other limitations, the limitations of Claim 1 reciting transforming data received from a source application.

Chin discloses a reward-based lead generation and transaction system comprising a sponsor, a referral system, and a plurality of recipients. *See* Chin, p. 4. Chin's system discloses a sponsor that contacts the referral system when an opportunity needs to be fulfilled and a referral system that contacts the plurality of recipients regarding the opportunity. *Id.* However, nothing in Chin shows, teaches, or even suggests anything comparable to transforming data. In fact, Chin simply discloses a sponsor entering a request to fulfill an opportunity, a referral system contacting recipients, and one of the recipients accepting the opportunity or transaction. Therefore, Chin fails to show, teach, or even suggest transforming data received from a source application.

Furthermore, Chin fails to even recognize a need for transforming data. This comes as no surprise because Chin provides a self-contained mechanism that allows a sponsor and the recipients to effectively interact with the referral system over the Internet. *See* Chin, p. 5. This self-contained characteristic makes Chin's system desirable because it provides a simple mechanism for communicating and interacting with agents in order to fulfill a transaction without the need (and so, support) for the sponsor or recipients to have access to any application software. *Id.* As such, other application software is neither necessary nor desired in Chin. All interactions between a sponsor and recipients can be done over the Internet in Chin's system. Thus, Chin neither evinces nor even recognizes any need to transform any data.

Moreover, one would not expect a transformation operation to be present in Chin. As explained above, Chin's referral system is self-contained, requiring no other applications for receiving data or distributing opportunity data to recipients. In fact, all of Chin's operations can be performed via the Internet, requiring no transformation operation (either within, or in interfacing with, Chin's referral system). Therefore, Applicants respectfully submit that Chin fails to show, teach, or even suggest transforming data received from a source application.

Claim 8, as amended is representative of independent Claims 15, 20, and 23, and now recites:

8. A method for data transformation, the method comprising:
receiving opportunity data from a source application, wherein the receiving is performed at an integration server; and
transforming the opportunity data into a common format defined by an opportunity class, wherein the opportunity class identifies a set of relationships of an opportunity with a plurality of entities related to the opportunity, and the transforming is performed at the integration server.

The Office Action has relied on Chin to disclose the limitations of Claim 8. Applicants respectfully submit that Chin fails to show, teach, or even suggest the claimed “transforming the opportunity data.” As explained above (in regards to Claim 1), Chin fails to show, teach, or even suggest transforming any data. Therefore, Chin fails to show, teach, or even suggest the limitations reciting transforming the opportunity data.

For at least these reasons, Applicants respectfully submit that Claims 2-6, 9-10, 12-13, 16-17, 19, and 21, are dependent upon allowable base Claims 1, 8, 11, 15, 18, and 20 and therefore request the reconsideration and withdrawal of the rejection to these claims.

Rejection of Claims under 35 U.S.C. § 103(a)

Claims 7 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chin. *See* Office Action, p. 15. Applicants respectfully traverse this rejection.


For at least the reason that Claims 7 and 14 are, respectively, dependent upon allowable base Claims 1 and 11, Applicants respectfully request the reconsideration and withdrawal of this rejection.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5094.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,



Ana G. Luther
Patent Agent for Applicants
Reg. No. 61,704
Telephone: (512) 439-5094
Facsimile: (512) 439-5099